



**Livestock and Seed Program  
Audit, Review, and Compliance Branch  
Quality System Audit Report**

**AUDIT INFORMATION**

<b>Applicant Name:</b>	Argencert S.R.L.
<b>Est. Number:</b>	N/A
<b>Physical Address:</b>	Bernardo de Irigoyen 972 4° "B", Buenos Aires, Argentina
<b>Mailing Address:</b>	Bernardo de Irigoyen 972 4° "B", Buenos Aires, Argentina
<b>Contact &amp; Title:</b>	Laura Montenegro, Director
<b>E-mail Address:</b>	<a href="mailto:Argencert@argencert.com.ar">Argencert@argencert.com.ar</a>
<b>Phone Number:</b>	+54 11 4334 0033
<b>Auditor(s):</b>	Darrell Wilson
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	October 20, 2006
<b>Audit Identifier:</b>	NP6293OOA
<b>Action Required:</b>	Yes
<b>Audit Type:</b>	Annual Update
<b>Audit Objective:</b>	To determine the compliance of the company's information to the requirements of the audit criteria.
<b>Audit Criteria:</b>	<ul style="list-style-type: none"><li>• 7 CFR Part 205.510, National Organic Program; Final Rule, dated December 21, 2000; Amended November 3, 2003</li></ul>
<b>Audit Scope:</b>	Argencert SRL 2006 NOP Annual Report
<b>Location(s) Audited:</b>	Desk

Information submitted by Argencert SRL for the 2006 annual update:

- » IFOAM accreditation documentation
- » Document list
- » Fee schedule
- » Client list
- » Performance Evaluation Statement
- » List of employees and inspectors
- » Conflict of Interest for all employees and inspectors
- » 3 certification files, 1 crop, 1 handler, and 1 wild crop



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**FINDINGS**

Procedures and records reviewed verified that Argencert SRL is currently operating in compliance to the requirements of the audit criteria. Eight out of eleven non-compliances issued during the previous on-site audit were verified and found to be implemented and effective therefore those non-compliances were cleared. Three minor non-compliances identified during the previous on-site audit were not verified therefore they remain outstanding (adequately addressed). One major non-compliance was identified during this audit.

**NP5066KKA.NC1 - Major – Cleared**  
**NP5066KKA.NC2 – Major – Cleared**  
**NP5066KKA.NC3 - Major – Cleared**  
**NP5066KKA.NC4 - Minor – Cleared**  
**NP5066KKA.NC6 – Minor –Cleared**  
**NP5066KKA.NC9 – Minor – Cleared**  
**NP5066KKA.NC10 – Minor – Cleared**  
**NP5066KKA.NC11 – Minor – Cleared**

**NP5066KKA.NC5 - Minor – Adequately Addressed** – NOP §205.401(c) requires “A person seeking certification of a production or handling operation under this subpart must submit an application for certification to a certifying agent. The application must include the following information: a copy of any notification of noncompliance or denial of certification issued to the applicant for certification; and a description of the actions taken by the applicant to correct the noncompliances noted in the notification of noncompliance including evidence of such correction. *ARGENCERT’s Organic Farm Plan Questionnaire does not address notifications of noncompliance and a description of the actions taken by the applicant to correct the noncompliance, including evidence of such correction.* **Corrective Action:** ARGENCERT’s Certification Application and Organic Farm Plan Questionnaire have been revised to address prior notifications of non-compliance and a description of the actions taken to correct the non-compliance.

**NP5066KKA.NC7 - Minor – Adequately Addressed** - NOP §205.403 (c) (1) requires “The on-site inspection of an operation must verify the operation’s compliance or capability to comply with the Act and the regulations of this part.” *A noncompliance was noted on the exit interview form for the inspection performed at the Bio Grain office on 1/9/04 which cited 205.661 “No register of complaints.” This is an additional requirement as NOP does not require a register of complaints. The inspector caught this mistake at the time of the exit interview during the 2005 on-site inspection, but the individual that reviewed the 2004 inspection report did not remove this noncompliance from the inspection report.* **Corrective Action:** ARGENCERT has amended the inspection questionnaires specifying that the inspector should not indicate non-compliances of requirements that are not in the NOP Rule. In addition, the ARGENCERT NOP Certification Manual Section 3.3. (1) states, “The operation's compliance or capability to comply with the Act and the regulations (the inspector is not expected to verify any point which is not mentioned there).”



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**NP5066KKA.NC8 - Minor –Adequately Addressed** - NOP §205.403(e)(2) requires “A copy of the on-site inspection report and any test results will be sent to the inspected operation by the certifying agent.” *Bio Grain had not received a copy of the inspection reports from the inspections performed on January 9, 2004 and May 21, 2004. Corrective Action:* ARGENCERT leaves a carbon copy of the inspection report with the inspected operation at the conclusion of the inspection.

**NP6293OOA.NC1 – Major** – NOP §205.510(a) Annual report and Fees, states, “An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports and fees: (1) A complete and accurate update pf information submitted pursuant to § § 205.503 and 205.504.”

- § 205.504 (d)(2) Copies of at least 3 different inspection reports and certification evaluation documents for production or handling operations certified by the applicant during the previous year for each area of operation for which accreditation is requested.” *Inspection reports and certification evaluation submitted for Antonio Pino (crop) and Bodegas y Vifiedos Nanni SA were submitted but were not translated into English.*